

**EXHIBIT A**

**IN THE UNITED STATES DISTRICT COURT  
FOR THE NORTHERN DISTRICT OF ILLINOIS  
EASTERN DIVISION**

M & G Health Associates, Inc., a/k/a  
M & G Health Associates, S.C.,

Plaintiff,

v.

Health Care Service Corporation, a Mutual Legal  
Reserve Company, d/b/a Blue Cross  
Blue Shield of Illinois,

Defendant.

Case No. 08 CV 3944

**AFFIDAVIT OF SCOTT HILGEMANN**

I, Scott Hilgemann, having first been duly sworn, on oath, state:

1. I am employed by Health Care Service Corporation, a Mutual Legal Reserve Company ("HCSC"), as the Vice President and Chief Underwriter. I have been employed by HCSC in that capacity since 2006, and have been employed by HCSC since 1991.

2. As the Vice President and Chief Underwriter, I oversee the processing of applications for group policies provided or administered by HCSC, and their renewals, that are submitted by employer groups to all four divisions of HCSC, including Blue Cross Blue Shield of Illinois.

3. As the Vice President and Chief Underwriter, I am familiar with the database maintained by HCSC which houses membership data and is referred to as the BlueStar System. My staff and I have utilized BlueStar and have found data contained therein to be highly reliable. The BlueStar System utilizes computing equipment that is standard in the industry and contains an electronic record of the name, applicable group name and other demographic information for all persons who are members of employer groups whose health care benefit plans are provided or

administered by HCSC. Individual members' names and other demographic information are input into BlueStar at the time the employer group enrolls in the plan provided or administered by HCSC. BlueStar is updated when changes occur to the employer groups. Entries into BlueStar are made in the regular course of HCSC's business, and it is the regular course of HCSC's business to make such entries into BlueStar at or near the time the employer group enrolls in a health care benefit plan provided or administered by HCSC, as whenever changes in the employer groups' information occur. The source of the information is the employer group, which provides information to HCSC so that HCSC may properly administer benefits under the employer groups' plan or group policy.

4. Among the information provided by the employer groups and retained in BlueStar is whether the benefits are provided under the terms of an employee welfare benefit plan subject to the Employee Retirement Income Security Act of 1973 ("ERISA").

5. HCSC enters into contracts with employer groups to provide health care benefits under a policy of insurance issued by HCSC. In such instances, known within HCSC as "Premium Groups", the employer group is required to identify the class of beneficiaries, including its employees, and pay all or a portion of the premiums.

6. In other instances, known within HCSC as "Cost Groups", HCSC enters into a contract with the employer group to provide specified administrative services for a welfare benefit plan established by the employer. When HCSC provides administrative services, the plan is established and funded by the employer, and the employer establishes the terms under which plan beneficiaries can obtain health care benefits.

7. The persons listed in the attached exhibit, and on Exhibits A, B, and C to the Complaint, were members of Premium or Cost Groups administered or provided by HCSC on the dates of service identified in the Complaint.

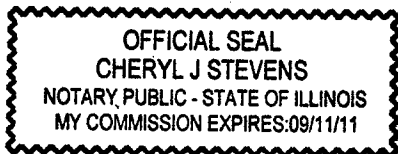
Further Affiant sayeth not.

August 4, 2008  
\_\_\_\_\_

By: Scott Hilgemann  
Scott Hilgemann

Subscribed and Sworn to before me  
on this 4<sup>th</sup> day of August 2008.

By: Cheryl J. Stevens  
Notary Public



NGEDOCs: 1552013.1

**EXHIBIT 1**

## Exhibit A from Complaint

DOS	PATIENT	GROUP	GROUP NAME	PATIENT ID	AMT BILLED
Redacted	Redacted	P72713	Tablecraft Products Company - Premium Group	Redacted	\$7,140.05
Redacted	Redacted	P10421	Santa's Best / Illinois Premium Group	Redacted	\$17,158.40
Redacted	Redacted	003735	Portland Cements Association - Cost Group	Redacted	\$5,488.16
Redacted	Redacted	P85010	Electrical Insurance Trustees - Cost Group	Redacted	\$13,591.55
Redacted	Redacted	P72713	Tablecraft Products Company - Premium Group	Redacted	\$10,281.55
Redacted	Redacted	S59368	Alexian Brothers Health System - Premium Group	Redacted	\$5,333.11
Redacted	Redacted	P51923	Wilcor Incorporated - Premium Group	Redacted	\$6,593.91
Redacted	Redacted	S59368	Alexian Brothers Health System - Premium Group	Redacted	\$14,853.00
Redacted	Redacted	S59368	Alexian Brothers Health System - Premium Group	Redacted	\$4,761.69
Redacted	Redacted	081209	United Airlines - Cost Group	Redacted	\$3,879.00
Redacted	Redacted	005966	APP Pharmaceuticals, Inc. - Premium Group	Redacted	\$3,519.00
Redacted	Redacted	P08856	Family Alliance Inc. - Premium Group	Redacted	\$17,551.10
Redacted	Redacted	014594	Pepsi Americas Active Salary - Cost Group	Redacted	\$13,408.80
Redacted	Redacted	081208	United Airlines - Cost Group	Redacted	\$2,629.00
Redacted	Redacted	P14922	Conference Plus Inc. - Cost Group	Redacted	\$4,258.85
Redacted	Redacted	P85010	Electrical Insurance Trustees - Cost Group	Redacted	\$5,807.10
Redacted	Redacted	016397	Tellabs Inc - Cost Group	Redacted	\$4,953.85
Redacted	Redacted	287824	Accenture LLP - Cost Group	Redacted	\$2,529.50
Redacted	Redacted	P82189	Schaumburg Toyota - Premium Group	Redacted	\$4,299.00
Redacted	Redacted	P04549	Klein Tools, Inc - Cost Group	Redacted	\$3,710.00

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DOS	PATIENT	GROUP	GROUP NAME	PATIENT ID	AMT BILLED
Redacted	Redacted	P48800	Genesis Medical Imaging - Premium Group	Redacted	\$10,384.65
Redacted	Redacted	P57320	Fellowes, Inc. - Cost	Redacted	\$22,762.70
					\$184,893.97

## Exhibit B from Complaint

DOS	PATIENT	GROUP	GROUP NAME	PATIENT ID	AMT BILLED
Redacted	Redacted	P20105	First Northwest Bank - Premium Group	Redacted	\$5,709.60
Redacted	Redacted	P03807	PGNF Home Lending Corporation - Premium Group	Redacted	\$3,032.92
Redacted	Redacted	P05412	Raman Industries - Premium Group	Redacted	\$3,746.97
Redacted	Redacted	P98060	North Suburban Clinic - Premium Group	Redacted	\$12,910.00
Redacted	Redacted	P10421	Santa's Best / Illinois - Premium Group	Redacted	\$5,400.40
Redacted	Redacted	P06403	Littelfuse, Inc. - Cost Group	Redacted	\$6,834.20
Redacted	Redacted	081200	United Airlines - Cost Group	Redacted	\$4,797.37
Redacted	Redacted	087660	Household International - Cost Group	Redacted	\$4,625.00
Redacted	Redacted	090010	Exelon - Cost Group	Redacted	\$27,300.61
Redacted	Redacted	P84774	School Health Corp - Premium Group	Redacted	\$4,871.00
Redacted	Redacted	P04543	Olympic Signs Inc - Premium Group	Redacted	\$3,437.50
Redacted	Redacted	819002	CEC Employee Group LLC - Cost Group	Redacted	\$4,993.00
Redacted	Redacted	081204	United Airlines - Cost Group	Redacted	\$16,338.70
Redacted	Redacted	014594	Pepsi Americas Active Salary - Cost Group	Redacted	\$13,075.95
Redacted	Redacted	P54501	Wal Mart - Cost Group	Redacted	\$6,225.00
Redacted	Redacted	P39314	Aquatics, Inc. - Premium Group	Redacted	\$7,685.50
Redacted	Redacted	P57320	Fellowes, Inc. - Cost Group	Redacted	\$3,721.00
Redacted	Redacted	P87490	Neck And Back LTD - Premium Group	Redacted	\$4,572.00
Redacted	Redacted	380001	Northern Trust - Cost Group	Redacted	\$3,812.00
Redacted	Redacted	819002	CEC Employee Group LLC - Cost Group	Redacted	\$5,095.12



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DOS	PATIENT	GROUP	GROUP NAME	PATIENT ID	AMT BILLED
Redacted	Redacted	081204	United Airlines - Cost Group	Redacted	\$12,432.10
Redacted	Redacted	P43521	Home Access Health - Premium Group	Redacted	\$4,356.00
Redacted	Redacted	S59368	Alexian Brothers Health System - Premium Group	Redacted	\$4,584.50
Redacted	Redacted	P12157	Target Sales And Marketing Inc. - Premium Group	Redacted	\$4,312.50
Redacted	Redacted	P78655	Diagnostic Imaging Center - Premium Group	Redacted	\$2,790.00
Redacted	Redacted	P05554	John T Girardi M D LTD - Premium Group	Redacted	\$2,737.00
Redacted	Redacted	P78655	Diagnostic Imaging Center - Premium Group	Redacted	\$3,579.00
Redacted	Redacted	015362	OCE-USA Holding, Inc. - Cost Group	Redacted	\$20,111.85
Redacted	Redacted	P12371	Helix Usa Ltd - Premium Group	Redacted	\$2,843.00
Redacted	Redacted	P12371	Helix Usa Ltd - Premium Group	Redacted	\$1,496.50
Redacted	Redacted	015542	Idex Corp. - Cost Group	Redacted	\$4,324.50
Redacted	Redacted	P33712	GWBAC Software Technology - Premium Group	Redacted	\$3,194.50
Redacted	Redacted	P82189	Schaumburg Toyota - Premium Group	Redacted	\$4,301.00
Redacted	Redacted	1SBC22	SBC - Cost Group	Redacted	\$4,043.50
Redacted	Redacted	P14885	Lee Auto Parts - Arlington Heights - Premium Group	Redacted	\$4,389.25
Redacted	Redacted	P12100	Partec Inc. - Premium Group	Redacted	\$5,135.00
Redacted	Redacted	P25300	MM Surveying - Premium Group	Redacted	\$5,473.25
Redacted	Redacted	380001	Northern Trust - Cost Group	Redacted	\$1,880.00
					\$240,167.29

Exhibit C from Complaint

DOS	PATIENT	GROUP	GROUP NAME	PATIENT ID	AMT BILLED
Redacted	Redacted	P76658	Miyano Machinery Inc. - Premium Group	Redacted	\$3,004.92
Redacted	Redacted	083639	United Parcel Service Inc. - Cost Group	Redacted	\$3,238.00
Redacted	Redacted	P95277	The Fulfillment Network - Premium Group	Redacted	\$7,801.70
Redacted	Redacted	367200	AON Corp. Inc. - Cost Group	Redacted	\$16,937.80
Redacted	Redacted	P08856	Family Alliance Inc. - Premium Group	Redacted	\$17,551.10
Redacted	Redacted	P87490	Neck And Back LTD - Premium Group	Redacted	\$3,167.00
Redacted	Redacted	S59368	Alexian Brothers Health System - Premium Group	Redacted	\$4,723.12
Redacted	Redacted	087646	Integrus Energy Group Inc. - Cost Group	Redacted	\$4,653.00
Redacted	Redacted	000784	Illinois Tool Works Inc. - Cost Group	Redacted	\$4,122.62
Redacted	Redacted	P25300	MM Surveying - Premium Group	Redacted	\$4,291.50

\$69,490.76
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